

ATTACHMENT 1

COMPLAINT FORM

(for filers who are prisoners without lawyers)

IN THE UNITED STATES DISTRICT COURT
FOR THE Western DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Trent Tyler Trepania

vs

(Full name of defendant(s))

Sawyer County, Lt. Joseph Sajdera,

Jody Kell Morgan, ^{Delaney} ~~Black~~ (first name not

known) Michelle Briggs, Robin Nelson,
and Michael Woller, Joshua Thompson.

Case Number:

20-cv-854-jdp

(to be supplied by clerk of court)

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and is located at
(State)

421 U.S. Hwy 63 Shell Lake, WI 54871
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

A.

3. Defendant Joseph Sajdera is a citizen of Wisconsin and his residence is unknown and he worked for Sawyer County as the jail Lieutenant.
4. ~~The~~ Defendant Koll Morgan is a citizen of Wisconsin whose residence is unknown and worked for Sawyer County as a jailer.
5. Defendant Delaney Black is a citizen of Wisconsin whose residence is unknown and worked for Sawyer County as a Deputy Jailer.
6. ~~Defendant~~ Michelle Briggs is a citizen of Wisconsin whose address is unknown and worked for Sawyer County as a deputy jailer.
7. ~~Defendant~~ Robin Nelson is a citizen of Wisconsin whose address is unknown ~~whose~~ worked for Sawyer County as a Nurse.
8. Defendant Michael Woller is a citizen of Wisconsin whose address is unknown and worked for Sawyer County as the jail Sergeant.
9. Defendant Joshua Thompson is a citizen of Wisconsin whose address is unknown and worked at Sawyer County as a jailer.

2. Defendant Sawyer County (Name)

is (if a person or private corporation) a citizen of _____ (State, if known)

and (if a person) resides at Po Box 507, Hayward WI 54843 (Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Sawyer County (Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Defendants Joseph Sajdera, Koll Morgan, Delaney Black, Michelle Briggs and Robin Nelson shared joint participation when they ignored Plaintiff's serious medical needs as well as their joint participating in the punishment by placing plaintiff in the restraint chair for 4 hours because he demanded medical attention. Those defendants showed a wanton disregard for his serious medical needs and were deliberately indifferent to his pain and suffering. While in the restraint chair the plaintiff had a seizure and again just a few hours later he had another seizure. Plaintiff requested his

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

This suit is being brought against each defendant in both their private and professional capacity. Plaintiff Trepania would like \$700,000 joint and several for the joint participation each defendant had in violating plaintiff's 8th Amendment right against cruel and unusual punishment and plaintiff's 11th Amendment right which gives him equal protection under the Law. Plaintiff is seeking injunctive relief by an order preventing him from being housed at Sawyer County because Plaintiff fears vindictive prosecution as well as further pain and suffering brought on as a consequence of this action. Plaintiff is seeking this injunction be ordered in an emergency and speedy fashion because of his fear of being housed there.

Keppra before these events and if given Keppra his seizure's could have been prevented. This happened at the Sawyer County jail on 3/23/19. Defendant Michael Woller placed the plaintiff in a holding cell after removing him from the restraint chair and left him there for 1 week. This cell has no running water and has a hole in the floor instead of a toilet. The conditions were terrible. Plaintiff was only allowed water when the jailers chose to give it to him and at one point they went a significant time without giving him ~~and~~ any. Plaintiff asserts under the penalty of perjury that defendant Woller placed him in the holding cell and left him there for a week because he was deliberately indifferent to plaintiff's medical needs and his pain and suffering showing a wanton disregard for plaintiff's health and well being. Plaintiff was kept in the holding cell from 3-24-19 to 4-1-19 at the Sawyer County jail. Defendant Joshua Thompson strapped plaintiff in the restraint chair showing wanton disregard for plaintiff's serious medical needs and was deliberately indifferent to plaintiff's pain and suffering. Sawyer County shares a symbiotic relationship and is equally responsible for what happened.

E. JURY DEMAND

☒ Jury Demand - I want a jury to hear my case
OR

☐ Court Trial - I want a judge to hear my case

Dated this 7th day of September 2020.

Respectfully Submitted,

Monte Chynai
Signature of Plaintiff

2001363
Plaintiff's Prisoner ID Number

421 U.S. Hwy 63
Shell Lake, WI 54871
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.